

JAP:JRL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

12M525

- - - - - X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18, U.S.C.
§§ 1546 and 2)

CHANDER CHAWLA and
DHARA PATEL,

Defendants.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

Christopher Ray, being duly sworn, deposes and says that he is a Special Agent with the United States Department of State ("DOS"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 3, 2012, within the Eastern District of New York, defendants DHARA PATEL and CHANDER CHAWLA did use an identification document, to wit, an Indian passport containing a United States visa, knowing that the document was not issued for lawful use of the possessor.

(Title 18, United States Code, Sections 1546 and

2)

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

The source of your deponent's information and the grounds for his belief are as follows:¹

1. My information comes from a joint investigation of the DOS and the United States Customs and Border Protection ("CBP"). I have spoken with CBP agents, interviewed the defendants and reviewed documents.

2. On June 3, 2012, defendants CHANDER CHAWLA and DHARA PATEL arrived at John F. Kennedy International Airport ("JFK") on Lufthansa Flight 404 from Frankfurt, Germany. Defendants CHANDER CHAWLA and DHARA PATEL presented themselves as father and daughter coming to the United States for a vacation. Defendant DHARA PATEL presented Indian passport #K1926654 in the name of minor child ("MC"), date of birth June 10, 1999, to a CBP officer. The passport that defendant DHARA PATEL presented contained a B1/B2 visa, visa control #20120793580003, issued by the United States Bureau of Consular Affairs on March 20, 2012. Upon inspection of the Indian passport and United States visa, the CBP officer determined that records indicated that MC entered the United States on April 9, 2012, but there was no record to indicate that MC had left the United States.

3. Defendants CHANDER CHAWLA and DHARA PATEL were interviewed by CPB officers, who questioned them about

their relationship and the visa on the passport presented by DHARA PATEL.

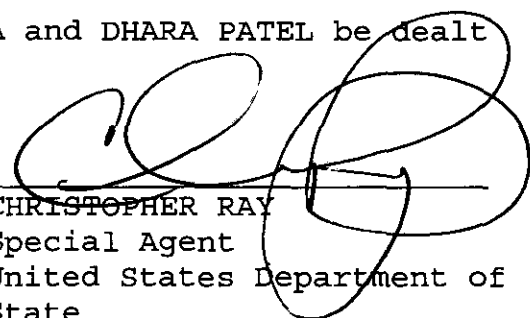
4. During the interview, defendant CHANDER CHAWLA stated that the person he was traveling with was not his daughter. Defendant CHANDER CHAWLA stated that he was contacted by a person who offered to pay him for bringing defendant DHARA PATEL to the United States. Defendant DHARA PATEL admitted her true identity, which was not that of MC, and stated that her family was supposed to pay CHANDER CHAWLA's family for CHAWLA bringing her to the United States.

5. Your deponent interviewed defendant CHANDER CHAWLA on June 4, 2012. During that interview, after being advised of his rights, defendant CHANDER CHAWLA admitted that defendant DHARA PATEL was not his daughter. Defendant CHANDER CHAWLA stated that he was contacted by an individual to bring in DHARA PATEL to the United States. CHANDER CHAWLA admitted that he was supposed to be paid upon landing at JFK Airport with DHARA PATEL.

6. Your deponent interviewed defendant DHARA PATEL on June 4, 2012. During that interview, after being advised of her rights, defendant DHARA PATEL stated, in substance and in part, that CHAWLA was a neighbor of her aunt in Mumbai, India, and that PATEL wanted to come to the

United States. DHARA PATEL further stated that her family reached an agreement with CHAWLA to pay CHAWLA to bring PATEL to the United States. DHARA PATEL stated that prior to departing for the United States, she met with CHAWLA, who advised her as to how to dress and how to answer questions when asked by customs inspectors.

WHEREFORE, your deponent respectfully requests that defendants CHANDER CHAWLA and DHARA PATEL be dealt with according to law.



CHRISTOPHER RAY
Special Agent
United States Department of
State

Sworn to before me this
4th day of June, 2012

—
lge
c